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Federal Communications Commission  
Via Comment System

To Whom It May Concern:

I am writing in reference to RM-10867. I am generally in favor of this proposal restructuring the licensing system for amateur radio. I feel that it will improve the usability of the spectrum involved, encourage additional persons to seek amateur radio licensure, and most importantly allow more hams to operate HF in emergency operations.

My personal interest in amateur radio is in public service. I am active in the local Skywarn program, assisting the National Weather Service (NWS) in detecting and warning the public of approaching severe weather. I actively attend and speak at many training sessions conducted by the NWS. I use these sessions as opportunities to recruit new amateur radio operators. I am also a member of the local ARES/RACES group and other volunteer emergency communications groups. As a professional firefighter/paramedic involved in disaster planning, I am more aware of the issues involving emergency preparedness and response than most.

With that background, I will offer these comments. While I generally support RM-10867, I feel that it does not go far enough in phasing out the reliance on Morse code (CW) proficiency as a testing criterion. I cannot see any good reason to continue any type of Morse code testing as a requirement for any class of amateur radio license. There is no reason to require applicants for any class of license to demonstrate proficiency in a mode of operation they have no intention of using. From an emergency operations perspective, there is no reason to exclude an otherwise fully qualified operator from operating voice or other non-CW modes on certain frequencies simply because they choose not to waste their time learning a skill they have no intention of using. Amateur radio is a HOBBY, which many people use to offer service to their fellow man during times of emergency.

I am NOT anti-CW. Many amateur radio operators enjoy that mode of communication and certainly should have segments of bands in which to practice this craft. I feel that band-plans are the best way of providing these sub-bands, not continued reliance on CW testing. Written testing should include questions testing knowledge of sub-bands to insure operators are aware of and respect CW sub-bands (as well as other sub-bands).

In summary, I recommend the adoption of RM-10867, with the exception that ALL CW testing be eliminated, and insuring that written testing properly covers sub-banding.

Thank you for considering my opinions in formulating future amateur radio licensing criteria.

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